

### **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of April 19, 2005.

Reconsideration of the Application is requested.

#### **The Office Action**

Claims 1, 3 – 9, 16 – 19 and 22 remain in this application. Claims 2 and 20 – 21 have been canceled.

Claims 1 – 4, 6 – 9 and 16 – 20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Owa et al. (U.S. Patent No. 6,348,971).

Claims 2, 5, 10 – 15 and 21 – 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Owa et al. in view of Smirnov et al. (U.S. Patent No. 6,546,364).

#### **Summary of Interview and Comments Regarding Advisory Action**

The following three paragraphs repeat the comments Applicants set forth in their Amendment After Final mailed May 19, 2005. This is provided for the convenience of the Examiner:

Applicants acknowledge and appreciate the time and courtesy Examiner Thierry L. Pham extended in participating in a telephone interview held May 18, 2005. The interview is summarized herein.

In the interview, the applicants indicated that amending claim 1 with the subject matter of claim 2, specifically adding the limitation of defining “resources” as equipment for performing printing tasks including printers, copiers, rollers, shrink wrappers, cutters, sealers and manual resources patentably distinguishes over the cited reference, namely Owa et al.(U.S. Patent No. 6,348,971).

Also, the applicants indicated that amending independent claim 16 to include the limitations of dependent claims 20 and 21 distinguishes over the cited prior art. It was also noted by Examiner Pham that including the limitation of “virtual” autonomous cells to the

independent claims, patentably distinguishes the claims over the primary reference, Owa et al.

With attention to the use of "virtual" as noted above, Applicants believed the use of this would be accepted in the claims. However, in speaking with the Examiner on July 18, 2005, the Examiner indicated that it was his understanding that while "virtual" would overcome the primary references, Owa et al. and Smirnov et al., additional searching would need to be undertaken. The Examiner indicated he was forwarding the results of the telephone interview where this was discussed.

### **Comments/Arguments**

Claims 2, 10 – 15 and 20 – 21 have been canceled without prejudice or disclaimer of the subject matter contained therein.

As to independent claim 1 and claims 3 – 9 which depend therefrom all rejections are hereby traversed.

In regard to independent 16 and claims 15 – 19 and 22 which depend therefrom, all rejections are hereby traversed.

As noted in the previous amendment, the Office Action cites the combination of Owa et al. and Smirnov et al. as making obvious the claimed subject matter of the present application. The applicants submit that this is an improper combination. First, there is no motivation to combine the two references. Smirnov et al. fails to teach or fairly suggest the autonomous cells as disclosed into the present application. Smirnov et al. actually **teaches away** from the claims in that all the resources are interconnected and grouped by the specific process of the resource. This is the opposite of an autonomous cell wherein the resources are grouped such that there is no interdependence between the different cells. The present application discloses autonomous cells wherein a first cell may include a printer, roller and shrink wrapper while a second cell may include a printer, cutter and inserter (see figure 5). Combining Smirnov with Owa destroys the intent of Smirnov et al. that is mapping the print job onto one of the plurality of interconnected paths through the resources.

Applicants have now removed "virtual" from the previously presented claims. In

view of this, and for the reasons which will be detailed below, it is Applicants belief the claims as they now stand are in proper form, and further that they clearly distinguish from the material disclosed in Owa et al. as well as Smirnov et al. It is also noted, that the Examiner believes the "arguments presented by the applicants are not persuasive . . ."

If Applicants' arguments are to be maintained as not persuasive, Applicants respectfully request the Examiner to point to those locations in either Owa et al. or Smirnov et al. which recite "the resources including equipment for performing printing tasks and the resources including printers, copiers, rollers, shrink wrappers, cutters, sealers and manual resources" as now recited in claim 1.

Secondly, the same arguments are presented with regard to dependent claim 21, now incorporated in claim 16. It is not apparent to Applicants, how Smirnov et al. combinable with Owa et al. without destroying the intent and features of Smirnov et al.

**CONCLUSION**

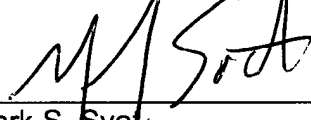
For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1, 3 – 9, 16 – 19 and 22) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

No additional fee is believed to be required for this Amendment After Final. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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Date

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